

I. INTRODCUTION

II. BACKGROUND

III. RELEVANT REGULATIONS AND POLICIES

- a. Standards of Conduct
 - i. 28 C.F.R. § 2635.101 Basic obligation of public service (honest effort, no preferential treatment, disclose waste/fraud/abuse, avoid appearance of violating ethical standards)
 - ii. 28 C.F.R. § 2635.704 Use of Government property (no use of gov't property for unauthorized purpose)
 - iii. 28 C.F.R. § 2635.705 Use of official time (use official time in honest effort to perform duties)
 - iv. BOP Program Statement 3420.11 Standards of Conduct
- b. Pre-Trial Inmates
 - i. 28 C.F.R. Part 551, Subpart J – Pretrial Inmates
 - ii. BOP Program Statement 7331.04 Pretrial Inmates
- c. Intake Screening
 - i. 28 C.F.R. Part 522, Subpart C – Intake Screening
 - ii. BOP Program Statement P5290.15 Intake Screening
- d. SHU
 - i. 28 C.F.R. Part 541, Subpart B - Special Housing Units
 - ii. BOP Program Statement 5270.11 Special Housing Units
- e. Telephone
 - i. 28 C.F.R. Part 540, Subpart I - Inmate Telephone Regulations
 - ii. BOP Program Statement P5264.08 Inmate Telephone Regulations
- f. Personal Effects/Medicine
 - i. 28 C.F.R. Part 553, Subpart B - Inmate Personal Property
 - ii. BOP Program Statement 5580.08 Inmate Personal Property
 - iii. 28 C.F.R. Part 549, Subpart B – Over-the-Counter (OTC) Medications
 - iv. BOP Program Statement P6541.02 Over-the-Counter Medications
 - v. BOP Program Statement P6360.01 Pharmacy Services
- g. Rounds & Counts
 - i. BOP Program Statement 5500.14 Correctional Services Procedures Manual, Ch. 3 Counts – Census Checks
- h. Suicide
 - i. 28 C.F.R. Part 552, Subpart E – Suicide Prevention Program
 - ii. BOP Program Statement P5324.08 Suicide Prevention Program
 - iii. BOP Program Statement P5310.17 Psychological Services Manual

IV. TIMELINE OF RELEVANT EVENTS

V. FACTUAL BACKGROUND

- a. Background Facts

Epstein Draft Outline (Revised 7.15.2021)

- i. Overview of BOP Procedures
 - a) Role & Responsibilities of CO
 - b) Inmate Counts
 - c) 30-Minute rounds
 - d) Suicide Prevention
 - e) Cellmates
 - f) Cameras
- ii. Epstein
 - a) General Background
 - b) Arrest
- b. Preceding Events re: Epstein
 - i. Detention at MCC
 - ii. 7.23.2019 suicide attempt
 - iii. Suicide Watch
 - iv. Observation
 - v. Cellmate
- c. Key Events in re: death
 - i. Granular 8.9.2019-8-10-2019 chronology
 - ii. Autopsy results
- d. Noel & Thomas arrest & DPA
Nee

VI. ANALYSIS

- a. Falsification of Inmate Count
- b. Failure to Conduct 30-Minute Rounds
- c. Failure to Ensure Epstein Had a Cellmate
- d. Violation of telephone policy
- e. Violation of personal property and medication policies

VII. CONCLUSION

- a. Possibly include BOP-wide recommendations, e.g., cameras

VIII. APPENDIX